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ATT: Valerie Frances

Vår saksbehandler:	Vår kontaktperson:	Vår Arkivkode:	Vår dato:	Deres dato:	Deres kontaktperson:	Deres Arkivkode:
Solgaard	Solgaard		27.04.06			

Comments on the Interim final report of the Aquaculture Working Group of the NOSB

Dear Ms Frances

Thank you very much for the opportunity to comment to the National Organic Standards Board (NOSB). Our company are the leaders in Norway and in the world on how to use cleanerfish to control sealice in netpens. Feel free to visit our webpage www.leppefisk.no – English version. We have our one R&D license for salmon and trout where we run research on how to optimize the use of cleanerfish, for the control of sealice and netfouling, and minimize/stop the use of chemical treatments. I have recently been to Ireland and Shetland where some of the organic salmon farmers this summer will try to use cleanerfish instead of slice (emamectin benzoate) and pyrethroids (alpha- and betamax). We have also been asked to go to Greece and Chile to look at the possibilities of developing the use cleanerfish or wrasse. Therefore we want to give some comments regarding the paragraph below;

Comments to § 205.254 Aquaculture living conditions.

(c) “Non-organic aquatic animals may be used in aquaculture production systems for controlling pests, such as weeds, snails and algae. When you talking about “pests” I believe you also are talking about sealice as *Lepeophtheirus salmonis* and *Caligus elongatus* and maybe others.

In the organic standard regarding aquaculture from Debio, the Organic certifying body in Norway says as follows;

“Biological combating of disease should be prioritised above use of chemicals where this is possible and effective, for example for delousing with the help of wrasse”. We mean that this should also be implemented in the rules under develop in US. So far as we know there have been no trials on using wrasse at the west coast of North America, but there are wrasse in North America which may be used for delousing, e.i. one species called cunner should be investigated.

In June this year we will have a meeting in Oslo with Becky Goldberg from environmental defense – they are eager to learn more about the Norwegian use of cleanerfish.

Villa has a close working relationship with Blue Circle Foods, located in Washington DC. The principals of this recently established company has a long history in dealing with Organic and Natural food. The extensive use of Cleanerfish as a natural way of delousing our fish has been endorsed by several of their clients, including leading

US retailers within this segment, and our goal is to be able to supply Organic Salmon, Cod and Trout to the US market as soon as the standards have been finalized. However, we will be happy to share the knowledge of the use of cleanerfish for the best of fish farming across the world. If the use of cleanerfish is mentioned in the standards this will help the farming world understand that there is a natural way to delouse fish.

Best regards,

A handwritten signature in blue ink that reads "Johan Solgaard". The signature is written in a cursive, flowing style.

Johan Solgaard

Research & Organic Manager

Villa Miljølaks AS – Villa Environmental Salmon Ltd